

**WA Army National Guard
Pamphlet 200-3**

Environmental Quality

Hazardous Materials Management Program

**Headquarters
Washington National Guard
Camp Murray, WA
18 February 2005**

SUMMARY of CHANGES

Wash Pam 200-3
Hazardous Material Management Plan

This pamphlet was completely revised. Previous procedures were reparagraphed for easier understanding.
This pamphlet - -

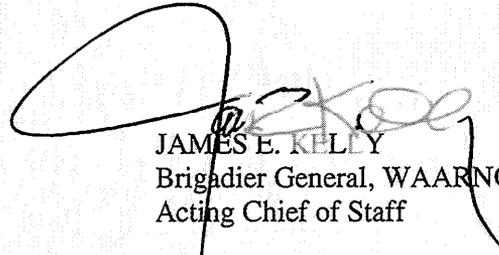
- Rescinds Chapter 4 Transporting Hazardous Material
- Rescinds Chapter 5 Training, Inspections, and Recordkeeping
- Rescinds Chapter 6 Spill Response Procedures
- Rescinds Chapter 7 Excess and Stockage Levels
- Establishes Chapter 4 Usage and Inventory
- Establishes Chapter 5 Material Safety Datasheets
- Establishes Chapter 6 Compatibility
- Establishes Chapter 7 Shelf-Life
- Establishes Chapter 8 Compressed Gas Cylinders
- Establishes Chapter 9 Excess and Stockage Levels
- Establishes Chapter 10 POL Trailers

HEADQUARTERS MILITARY DEPARTMENT
STATE OF WASHINGTON
Camp Murray
Tacoma, Washington 98430-5000
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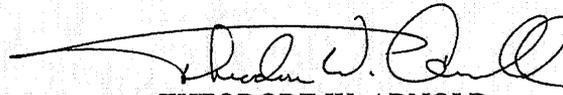
**Environmental Quality
HAZARDOUS MATERIALS MANAGEMENT PROGRAM**

By Order of the Adjutant General



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History. This printing is the first revision of this pamphlet.

Summary. This pamphlet provides uniform policy and procedures for environmental compliance in the Washington Army National Guard (WAARNG) and the Military Department.

Applicability. This pamphlet applies to the WAARNG, Washington State Guard, and civilian employees of the Washington Military Department.

Proponent and exception authority. The proponent for this pamphlet is the WAARNG Environmental Office.

Suggested improvements. Users are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to Military Department - State of Washington, ATTN: Environmental Office, Camp Murray, WA 98430-5080.

Distribution A - Army National Guard, Washington State Guard

This pamphlet supersedes WA ARNG Pamphlet 200-3, dated 29 March 2002.

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Chapter 1

INTRODUCTION

This Hazardous Materials Management Plan (HMMP) sets responsibilities, policies, and procedures for storing and managing hazardous materials and wastes within the Washington Army National Guard (WAARNG). Required by Army Regulation (AR) 200-1, Environmental Protection and Enhancement, the HMMP is written to ensure WAARNG compliance with applicable federal, state, local laws, and regulations.

Legal Statement

Compliance with laws and rules regarding Hazardous Waste Management, as reflected in this pamphlet, is vitally important. Violation of these requirements can result in issuance of notice of violation by the Washington Department of the Ecology and/or the Federal Environmental Protection Agency. Such a notice of violation can result in a fine of thousands of dollars. The person responsible for the violation may be held personally liable for the violation and the fine. Further, failure to comply with the requirements and procedures of this pamphlet may subject the violator to adverse administrative action, termination from employment, and military or civilian criminal prosecution.

1-1. Purpose

a. The Hazardous Material Management Program (HMMP) is to manage the procurement and use of Hazardous Materials (HM) to support Washington Army National Guard (WAARNG) missions, ensure the safety and health of personnel and surrounding communities, and minimize WAARNG dependence on HM. The HMMP includes the activities and infrastructure required for on-going identification, management, tracking, and minimization of HM.

b. This pamphlet documents the WAARNG HMMP. It applies to:

- (1) All units and activities under the command of the WAARNG
- (2) Any other activity that disposes of waste while using WAARNG training sites
- (3) Training conducted outside of Washington or on active duty installations within the state, unless the Standing Operating Procedure (SOP) for the host activity dictates otherwise. Activities permanently located on active duty installations must comply with this pamphlet, unless the SOP for the host activity dictates otherwise

c. The goals of the HMMP are to reduce HM use and the amount stored within facilities and units. The primary means to reduce the amount of HM purchased are:

- (1) Requisition the Exact Quantity Required – review the quantity needed and order that amount regardless of the Unit of Issue (UI) listed by the FEDLOG.
- (2) Substitute Less Hazardous Materials to Complete the Job – The Army Materiel Command's (AMC) Pollution Prevention Office has targeted many hazardous materials for reduction and substitution. Contact the Hazardous Materials Management Office for assistance to identifying effective substitutes.
- (3) Reduce Inventories – Activities should refer to chapter 9 for procedures to determine reorder points and requisitioning objectives for hazardous material. Battery requisitioning procedures are found

in chapter 3. These procedures will assist the activities in requisitioning only the amount need thus reducing excess product on the shelves and waste due to inventory mismanagement.

(4) Reduce Order/Ship Time (OST) – The goal is for users to rely on quick delivery rather than stockpile HM in the event that the order is delayed.

(5) Increase Safety/Health of Personnel – The goal is to lower baseline stock levels and decrease the potential for exposure to HM thus creating a safer, healthier work environment. Additionally, the occurrence for a release to the environment will be reduced.

(6) Decrease Waste Disposal – When smaller quantities are purchased the potential for shelf-life expiration and unused quantities are reduced thereby reducing the costs associated with waste disposal of the HM.

(7) Shelf-Life Management – Ordering the smallest quantity of HM to accomplish a task reduces the need to manage the shelf life on many containers of the same product. Units should use the first in, first out (FIFO) method of managing products.

1-2. References

Appendix A lists publications referenced in and/or related to this document.

1-3. Explanation of abbreviations and terms

Abbreviations and special terms used in this pamphlet are explained in the glossary.

1-4. Responsibilities

The following responsibilities are organized according to the WAARNG command structure.

a. The Adjutant General

(1) The Adjutant General (TAG) is responsible for establishing a comprehensive environmental program complying with all federal, state, and local environmental laws as well as, implementing environmental regulations and all aspects of the Department of Army's environmental policies and programs.

(2) The Adjutant General is responsible for establishing and emphasizing environmental compliance policy for the WAARNG.

b. The Assistant Adjutant General

(1) The Assistant Adjutant General (AAG/Army) will assume the duties and responsibilities in the absence of The Adjutant General.

(2) The AAG/Army will establish organizational structures to implement the WAARNG Environmental Management System.

(3) The AAG/Army will consider environmental protection and natural/cultural resource preservation (and implement these measures whenever necessary) when executing WAARNG's overall mission.

(4) The AAG/Army will ensure that Major Subordinate Commands (MSCs), Battalions, Companies, Activities (i.e., a non-unit structure such as an organizational maintenance shop (OMS)) and any other unit under his/her jurisdiction, appoint Environmental Compliance Officers (ECOs).

(5) The AAG/Army will serve as Chairman of the Environmental Quality Control Committee (EQCC).

c. Chief of Staff

(1) During the absence of the AAG, the Chief of Staff (COS) will assume the AAG role to ensure compliance with all federal, state, regional and local environmental laws and regulations.

(2) The COS will monitor environmental projects and activities of the subordinate units and activities under his/her jurisdiction.

(3) The COS will review all draft WAARNG Environmental Assessments (EAs) and/or Environmental Impact Statements (EISs) for proposals involving construction, training, troop reorganization, and force modernization before distributing it for public comment.

(4) The COS will ensure that representatives of environmental regulatory agencies are provided appropriate access to WAARNG facilities. Access will be limited only for reasons of national security or personal safety. For areas so restricted, all efforts will be made to arrange conditions for inspection.

(5) The COS will track the deficiencies, weaknesses, and progress of environmental audits.

(6) The COS will coordinate environmental-related congressional inquiries with the Public Affairs officer (PAO) and the Assistant Director, Environmental Programs (EPM).

(7) The COS will also serve as Chairman of the EQCC in the absence of the AAG/Army.

(8) The COS will ensure that the WAARNG Environmental Training Program is established and implemented. The COS must ensure that:

(a) Personnel responsible for environmental duties are adequately qualified and retrained as needed.

(b) Through its design and implementation, gives each soldier the required level and frequency of training for his/her respective position

(c) Through its design, meets all regulatory requirements

(d) Is managed by the EPM (To manage the program effectively, EPM should receive input from all Directorates regarding environmental training needs.)

d. Facilities Management Office

(1) The Facilities Management Office (FMO) will establish a phased, orderly plan and schedule for improving facilities not meeting current environmental standards.

(2) The FMO will ensure that all construction projects are planned, programmed, budgeted, and resourced in accordance with (IAW) applicable local, state, and federal environmental laws and regulations.

(3) The FMO will coordinate all real estate actions to provide time to document environmental considerations.

(4) Before distributing it for public comment, the FMO will review all draft WAARNG EAs and/or EISs for proposals involving construction, training, troop reorganization, and force modernization.

(5) The FMO will participate in the development of the Environmental Training Plan.

(6) The FMO will assist and coordinate with directorates on environmental issues that affect them. The FMO will serve as a member of the EQCC.

e. Environmental Programs Manager (EPM)

(1) The EPM will serve as adviser to the AAG/A on WAARNG environmental issues, programs, and progress in complying with federal, state, local, and Army regulations.

(2) The EPM will coordinate, consult, and cooperate with federal, state, and local authorities to design and execute projects and activities required to maintain WAARNG compliance with applicable environmental protection requirements.

(3) The EPM is responsible for planning, programming, and budgeting for WAARNG environmental compliance and enhancement requirements, including estimating program cost for facilities improvement.

(4) The EPM will define and implement the overall WAARNG Environmental Management System for all federal, state, and civilian members of the WAARNG. The EPM will serve as the point-of-contact for all staff functions whose activities may involve an environmental program area, as described in this regulation.

(5) The EPM will prepare all required federal, state, and local environmental reports.

(6) The EPM is the environmental technical authority. EPM will provide technical assistance to all personnel requesting guidance.

(7) The EPM will monitor state and federal environmental, legislative, and regulatory developments affecting WAARNG activities.

(8) The EPM will assist and coordinate with directorates on environmental issues that affect them. The EPM will serve as a member of the EQCC.

(9) The EPM will ensure distribution of information regarding the EQCC plans, policies, programs, and progress.

(10) The EPM will conduct periodic compliance assessments to ensure compliance with the WAARNG Environmental Management System.

(11) The EPM will participate in the development of the Environmental Training Plan. The EPM will ensure that the Environmental Training Plan definitively states the training requirements for WAARNG personnel.

f. Public Affairs Officer

(1) The Public Affairs Officer (PAO) will establish a public affairs program supporting the Army National Guard's (ARNG's) environmental protection and enhancement activities IAW the policies of Army Chief of Public Affairs (CPA), NGB-Public Affairs (NGB-PA), and this regulation.

(2) The PAO will coordinate with the EPM to prepare and disseminate media releases involving public relations, environmental emergencies, regulatory compliance issues, and penalties. Where the proposed WAARNG activities are involved, the PAO will coordinate with the EPM to conduct public involvement activities required by the National Environmental Policy Act (NEPA), the State Environmental Policy Act (SEPA) and the Installation Restoration Program (IRP).

(3) Before distributing them for public comment, the PAO or designated representative will review all draft WAARNG EAs and/or EISs for proposals involving construction, training, troop reorganization, and force modernization.

(4) The PAO or designated representative will serve as a member of the EQCC.

g. U.S. Property and Fiscal Officer

(1) The U.S. Property and Fiscal Officer (USP&FO) will assist and coordinate budgeting and contract requirements for environmental programs and projects.

(2) The USP&FO, in coordination with DCSLOG, will ensure that all logistics regulations, standard operating procedures (SOPs), policies, and other procedures are reviewed and are consistent with federal, state, and local environmental regulations.

(3) The USP&FO will coordinate with the Deputy Chief of Staff – Logistics (DCSLOG) and EPM to ensure that all hazardous materials and dangerous wastes are transported IAW federal, state and local regulations.

(4) The USP&FO will serve as a member of the EQCC.

h. Deputy Chief of Staff – Logistics

(1) The DCSLOG is responsible for implementing the WAARNG Environmental Management System at facilities under its control and during WAARNG hazardous material transportation.

(2) The DCSLOG will provide a method of disposing of all materials and wastes regulated by federal, state, and local environmental regulations.

(3) The DCSLOG will determine the most cost effective operational method for procuring materials and services to manage the WAARNG Environmental Management System.

(4) The DCSLOG activities will ensure that the appropriate MSDS with each hazardous material are available.

(5) The DCSLOG will minimize solid and hazardous (dangerous) waste generation and identify alternative procedures and materials in accordance with the WAARNG Hazardous Materials Management Program (HMMP). The DCSLOG will ensure that all dangerous waste generated during operations is managed IAW all local, state, and federal requirements. The DCSLOG will maintain an accurate and current inventory of dangerous wastes and hazardous materials.

(6) The DCSLOG will ensure training of all personnel assigned to the directorate IAW the training matrix for FTM personnel and Traditional Soldiers. The DCSLOG will forecast appropriate funding to NGB in order to fund and comply with training requirements (particularly for FTM personnel).

(7) The DCSLOG will review all draft WAARNG EAs and/or EISs for proposals involving construction, training, troop reorganization, and force modernization before distributing them for public comment.

(8) The DCSLOG/MS will participate in the development of the Environmental Training Plan.

(9) The DCSLOG or designated representative will serve as a member of the EQCC.

(10) The DCSLOG will ensure that WAARNG logistical plans and operations (including petroleum oil and lubricant (POL) storage facilities and transfer operation activities) and any proposed changes are reviewed for environmental consequences and for compliance with environmental regulations, as necessary.

(11) The DCSLOG will ensure that activities appoint one ECO and one assistant ECO for each facility, or activity. The ECO will coordinate implementation of the WAARNG Environmental Management System for actions governed by the directorate.

(12) The DCSLOG will coordinate all necessary WAARNG logistical regulations and SOPs with the EPM to ensure that policies and procedures are IAW federal, state, and local regulations.

(13) The DCSLOG will comply with all local, state, and federal environmental regulations. The DCSLOG will ensure that WAARNG vehicle maintenance facilities (i.e., FMSs, the Unit Training Equipment Site (UTES), the Mobilization and Training Equipment Sites (MATES), and the Combined Support Maintenance Shop (CSMS)) comply with the WAARNG Environmental Management System and all applicable federal, state, and local requirements.

(14) The DCSLOG will provide the information needed to prepare reports for local, state, and federal regulatory agencies.

(15) The DCSLOG will ensure that all inspections of maintenance facilities are conducted IAW paragraph 4-6 of NGR 750-51 15 August 2003 and include an environmental compliance review.

(16) The DCSLOG is responsible for assisting in environmental audits.

i. The Deputy Chief of Staff – Operations and Plans

(1) The Deputy Chief of Staff – Operations and Plans (DCSOPS) is responsible for ensuring that WAARNG training plans, programs, exercises, and proposed mission changes are reviewed for environmental consequences and documented accordingly. Although the proponent of the action is responsible for preparing any required records of environmental consideration (RECs), EAs or EISs, DCSOPS will review all EAs and EISs before they are distributed for public comment.

(2) The DCSOPS is responsible for implementing the WAARNG Environmental Management System with respect to integrating guidance into the yearly training guidance, yearly training calendars and for planning the use of (and enforcement of the proper use of) ammunition.

(3) The DCSOPS, in coordination with the WAARNG Environmental Office, will ensure that all required training is incorporated into the yearly training calendar. DCSOPS will support traditional soldier requirements for environmental training when the training is included in the budget process and funds have been provided by NGB.

(4) The DCSOPS will ensure that all categorical exclusion training area requests are staffed in accordance with this regulation, Command Policy Memorandum DCSOPS 4-99, and WAARNG Regulation 350-5 prior to submission to AAG/A for approval.

(5) The DCSOPS will participate in the development of the Environmental Training Plan.

(6) In the event that both the AAG and the COS are both unavailable, the DCSOPS will serve as a member of the EQCC.

j. State Army Aviation Office

(1) The State Army Aviation Office (SAAO) will ensure that Army Aviation Support facility (AASF) activities (and all other WAARNG aviation operations, training, and maintenance activities) are conducted IAW the WAARNG Environmental Management System and all applicable federal, state, and local requirements.

(2) The SAAO will ensure that aviation facilities receive an environmental compliance review, at least annually.

(3) The SAAO will appoint a Primary and Alternate ECO for the Directorate. The Primary and Alternate ECO will implement the WAARNG Environmental Management System for actions governed by the Directorate.

(4) The SAAO will ensure that ongoing WAARNG aviation maintenance program plans, operations, activities, facilities, and proposed changes are reviewed for environmental consequences and compliance with environmental regulatory standards.

(5) The SAAO will ensure that aviation personnel identify, handle, manage, and track dangerous waste generated during its operations IAW all local, state, and federal regulations.

(6) The SAAO will assist in environmental audits of aviation flight facilities.

(7) The SAAO will review NEPA/SEPA Documentation, when applicable.

(8) The SAAO is responsible for all safety programs with respect to federal WAARNG employees and facilities.

(9) The SAAO will evaluate, prescribe, and provide proper personal protective equipment (PPE) to meet the WAARNG Environmental Management System requirements to ensure the safety of all federal WAARNG personnel. The SAAO prescribes and reviews proper safety equipment to meet the

WAARNG Environmental Management System requirements including hazardous material storage, state and local Fire Marshall Requirements, and overall safe working environment.

(10) The SAAO will ensure that Material Safety Data Sheets (MSDSs) for hazardous materials are available in aviation flight facilities.

(11) The SAAO is responsible for certifying the health and safety-training program meets all applicable federal and state standards.

(12) The SAAO will serve as a member of the EQCC.

k. Occupational Health Nurse

(1) The Occupational Health Nurse (OHN) is responsible for administering the state industrial hygiene/occupational health program, the radiation safety program, and the state respiratory protection program.

(2) The OHN is responsible for the development and annual review and update of all health plans (as they pertain to federal facilities and employees) including but not limited to the Hazard Communication Plan (HCP), medical surveillance, and health assessments.

(3) The OHN will participate in the development of the Environmental Training Plan.

(4) The OHN will serve as a member of the EQCC.

l. Safety Officer

(1) The SAFO is responsible for the development and annual review and update of all *health and* safety plans and programs (as they pertain to federal facilities and employees).

(2) The SAFO will evaluate, prescribe, and provide proper PPE to meet the WAARNG Environmental Management System requirements to ensure the safety of all federal WAARNG personnel. The SAAO prescribes and reviews proper safety equipment to meet the WAARNG Environmental Management System requirements including hazardous material storage, state and local Fire Marshall Requirements, and overall safe working environment.

(3) The SAFO will participate in the development of the Environmental Training Plan.

(4) The SAFO is responsible for safety concerns.

(5) The SAFO will serve as a member of the EQCC.

m. Staff Judge Advocate

(1) The Staff Judge Advocate (SJA), provides overall legal advice to The Adjutant General on environmental matters affecting the WAARNG IAW this regulation and AR 200-1.

(2) The SJA will coordinate the representation of The Adjutant General and the State of Washington with the State Attorney General or the local United States Attorney before courts, administrative tribunals, and regulatory bodies IAW the policies and procedures of AR 27-40 and AR 200-1.

(3) The SJA is responsible for advocating and promoting compliance by WAARNG entities with all applicable federal, state, regional, and local environmental requirements.

(4) Before distributing the documents for public comment, the SJA will review all draft WAARNG EAs or EISs for proposals involving construction, training, troop reorganization, and force modernization.

(5) The SJA will assist in negotiating and reviewing environmental agreements.

(6) The SJA will advise The Adjutant General on applicability of any taxes, penalties, fee, fines, sanctions, or compliance orders arising from federal, state, or local environmental requirements or enforcement activities.

(7) The SJA will review environmental studies, having significant legal ramifications, and assist in determining appropriate WAARNG actions.

(8) The SJA will serve as a member of the EQCC and represent the legal concerns of WAARNG environmental actions.

n. Major Subordinate Commands

(1) Major Subordinate Commands (MSCs) will integrate activities to protect and conserve environmental, natural, and cultural resources into the planning and execution of the command's mission.

(2) MSCs will assure environmental compliance throughout their units.

(3) MSCs will designate membership and make recommendations to the EQCC for each command.

(4) MSCs will ensure that all POL, hazardous substances, and wastes are inventoried, managed, handled, and disposed of IAW local, state, and federal regulations.

(5) MSCs will provide troop labor and equipment for cleaning up POL spills.

(6) MSCs will ensure that environmental awareness training is provided to traditional soldiers.

(7) Each MSC commander will appoint one Primary ECO and one Alternate ECO. The Primary ECO must be a full-time employee of the command. The Alternate ECO must be a traditional soldier. The Alternate ECO will assist the Primary ECO. When the Primary ECO is absent, the Alternate ECO will act on their behalf.

(8) MSCs will ensure that categorical exclusion training area (CXTA) requests are submitted to DCSOPS no later than (NLT) 150 days prior to the scheduled training event. Staffing through the WAARNG Environmental and SJA offices will not exceed a total of 30 days. DCSOPS will then provide TAG the CXTA request for review and approval, with a response to the unit approximately 120 days prior to the training event.

(9) MSCs will each have a member on the State EQCC.

o. Battalion/Group Commanders

(1) Battalion/Group Commanders will integrate activities to comply with the WAARNG Environmental Management System as a part of planning and executing the command's mission.

(2) Battalion/Group Commanders will ensure that all POL, hazardous substances, and wastes are inventoried, managed, handled, and disposed of IAW local, state, and federal regulations.

(3) Battalion/Group Commanders will oversee WAARNG Environmental Management Systems within their command to ensure compliance with the programs by subordinate units.

(4) Battalion/Group Commanders will ensure that environmental awareness training is provided to traditional soldiers.

(5) Battalion Commanders will appoint:

(a) One Primary full-time UECO. The suggested Primary UECO should be either the Battalion Maintenance Officer (BMO) or the Battalion S4 Noncommissioned Officer (NCO).

(b) One Alternate UECO. The Alternate UECO will assist the Primary UECO and will act in their absence. The Alternate UECO will be a traditional soldier.

(c) A facility/activity manager for each facility (including armories and FMSs) to oversee environmental compliance. This person will oversee everything within the fence-line. This person may be an activity commander, the UECO, or both. In the event of an outside environmental compliance inspection by federal and/or state regulators, an environmental compliance assessment system (ECAS), or internal compliance assessment system (ICAS), this person will provide access to all storage areas, cabinets, lockers, CONEXs (etc.). This person will also have access to all environmental documents (e.g., inspection logs, training records, inventories, dangerous waste manifests, etc.).

(d) An Administrative Officer (AO, usually the ranking staff officer at Battalion HQ) to oversee the activities of the UECOs, FTM staffs & M-Day personnel who may perform duties during the week. The AO will be the senior full-time officer to ensure that their duties are being performed during the normal workday (non-IDT, Non-AT).

(e) At maintenance facilities, AOs must ensure that UECOs are providing full-time support to WAARNG's overall Environmental Management System. The senior full time officer/NCO must have keys to all areas where hazardous materials and wastes are stored

(f) Within the unit command structure, AOs must ensure that UECOs are making proper appointments at the unit level to carry out environmental duties (e.g., spill response team) and providing the necessary training in support of the WAARNG Environmental Management System.

p. Company / Detachment Commanders

(1) Company / Detachment Commanders will integrate activities to comply with the WAARNG Environmental Management System as a part of planning and executing the command's basic mission.

(2) Company / Detachment Commanders will ensure that all personnel who inventory, manage, handle, and dispose of POL, hazardous substances, and wastes IAW local, state, and federal regulations are trained.

(3) Company / Detachment Commanders will establish an organizational structure to plan, execute, and monitor environmental programs.

(4) Company / Detachment Commanders will coordinate with their higher HQ to design and execute projects and activities required to bring the command into environmental compliance.

(5) Company / Detachment Commanders will provide representatives of regulatory agencies and WAARNG inspectors with appropriate access to any facility or activity under their command.

(6) Company / Detachment Commanders will report all regulatory agency inspections, Notices of Violation (NOVs) or other environmental corrective actions through the Chain of Command, thru DCSOPS, to the JOC, with a cc to CFMO: Attn – EPM.

(7) Company / Detachment Commanders will report discoveries of illegal dumping IAW 6 above.

(8) Company / Detachment Commanders will report all spills IAW 6 above.

(9) Company / Detachment Commanders will review all proposed training or construction projects under the guidelines established in AR 200-2 to determine possible adverse environmental impacts, and submit NEPA checklists and RECs IAW 6 above.

(10) Company / Detachment Commanders will appoint a Primary and Alternate UECO. The Alternate UECO will assist the UECOs and will act in their absence. One must be full-time and one should be a traditional soldier. The suggested UECOs are the Executive Officer (XO) and the supply NCO.

q. Joint Forces Headquarters Environmental Management Section

(1) The Joint Forces HQ (JFHQ) Environmental Management Section (EMS) will ensure that the WAARNG Environmental Management System is implemented during inactive duty training (IDT) and annual training (AT) events.

(2) The EMS will provide Environmental Awareness and Unit Environmental Compliance Officer (UECO) training support to units.

(3) The EMS will assist the EPM in preparing and staffing environmental plans and reports.

(4) The EMS will assume the role of the Environmental Office for post-mobilization activities.

(5) The EMS will participate in the development of the Environmental Training Plan.

r. Unit Environmental Compliance Officers

(1) The UECO (who may be an officer or NCO) will oversee compliance with the provisions of the WAARNG Environmental Management System as this regulation describes.

(2) UECOs shall be of Wage Grade-7/9 or above for personnel serving in a federal technician. UECOs shall be of SSG / E6 or above if serving in a military status.

(3) Primary UECOs must be full-time employees of the unit or activity they represent. An Alternate UECO (a traditional soldier) will support the Primary UECO for MSCs, Battalions, and Companies. A full-time person at activities will support the Primary UECO.

(4) The Primary and Alternate UECO will be appointed on orders. The UECO will be responsible for the WAARNG Environmental Management System at only one unit or one activity.

s. Environmental Quality Control Committee

(1) The Environmental Quality Control Committee (EQCC) will act on the broad range of environmental issues covered in this regulation.

(2) EQCC will advise AAG/A on environmental priorities, policies, strategies, and programs.

(3) The AAG/Army will serve as Chairman and is responsible for convening the EQCC.

(4) The following is a list of EQCC members:

(a) The FMO.

(b) The EPM.

(c) The USP&FO.

(d) The DCSLOG-M.

(e) The SAAO.

(f) The DCSOPS.

(g) The OHN.

(h) The SAFO.

(i) The PAO.

(j) The SJA.

(k) The MSC.

(5) The EQCC will perform the duties of the Environmental Management Committee as specified in AR 200-1, paragraph 15-11b.

(6) The EQCC will include the Pollution Prevention (P2) Program as a key and on-going function.

(7) The EQCC will convene as directed by the AAG/Army.

Chapter 2 SETTING UP STORAGE AREAS FOR HAZARDOUS MATERIALS

2-1. Operational Safety Warning

Reference: TM 38-400, Joint Service Manual (JSM) for Storage and Material Handling

When checking in new products or maintaining current stock, WAARNG personnel must properly store hazardous material in order to minimize hazards to persons and property. Hazardous material can be stored in storage lockers, rooms, buildings, trailers, or racks. There are special guidelines for storing compressed gases.

WARNING!

- Do not store tools or personal items in any hazardous material storage location.
- Do not store combustible materials, such as cardboard, paper, or rags with flammable hazardous material.
- Do not store flammable or reactive hazardous material within 50 feet of the property boundary.
- Do not store hazardous material in unauthorized vehicles, personal wall lockers, or in areas with high foot or vehicle traffic.
- Do not store pesticides in any hazardous material storage locker (See WAARNG Integrated Pest Management Plan).
- Do not store propane cylinders in flammable cabinets.
- Store non-bulk containers of hazardous material in cabinets and containers approved by OSHA (29CFR1910.106 (d) (3)); or for bulk containers, in FMO approved storage rooms.

NOTE: When dispensing flammable hazardous material, ensure the area is properly grounded and bonded.

2-2. Storage Cabinets

- a. Activities will place orders through the DCSLOG. The DCSLOG researches and verifies standards to USPFO-P&C for procurement of cabinets and containers.
- b. Use OSHA approved storage cabinets in the work area to store daily amounts of commonly used hazardous material, such as grease tubes, quart cans of oil, aerosol cans, etc. The cabinet color designates the type of material being stored.
- c. The following color scheme is required:

Hazardous Material Type	Locker Color
Flammables	Yellow
Corrosives	Blue
Oxidizers	Red

- d. Keep the cabinets clean and orderly. Conduct weekly inspections of cabinets for structural integrity including doors, hinges, and shelves. Do not remove the door or ventilation bungs, penetrate the wall, modify ventilation, or otherwise modify the cabinet. Keep cabinet doors closed when materials are not being transferred.

e. To set up a cabinet,

STEP 1. Use the following guidelines to select a location for the cabinets:

- Cabinets located indoors, must be placed in a well-ventilated area.
- Cabinets located outdoors should be under cover and on concrete, if available.
- Maintain easy access to the cabinet.
- Do not block doors.
- Do not place cabinet near break rooms, bathrooms, offices, or other occupied non-shop areas.
- Do not place cabinet near floor drains, drainage channels, catch basins, storm drains, or areas with high foot or vehicle traffic.
- Check compatibility before placing a storage cabinet within a storage area. Direct any questions regarding Storage Cabinet placement to the Environmental Office P2 MANAGER.
- Ensure the words “Flammable-Keep Fire Away” are marked on storage cabinets that contain flammable chemicals.
- Clearly mark each cabinet with “No Smoking within 50 Feet”.

STEP 2: Assign a four-character identifier to the cabinet and mark it on the front top right corner.

This identifier will consist of one of the below abbreviations and a 2 digit sequential number (for example, FL01). The following abbreviations will be used to identify the different types of cabinets.

- FC – Flammable Cabinet
- CC – Corrosive Cabinet
- OC – Oxidizer Cabinet
- TL – Trailer

Each cabinet must have a unique number designator. Do not use designators more than once in any compound.

STEP 3: Post any warning signs required by the WAARNG Safety Office (SAFO). Do not place unauthorized signs, labels, stickers, or markings on the cabinets.

STEP 4: Ensure that appropriately rated fire extinguisher and spill response equipment is located nearby.

STEP 5: Prior to setting up the cabinets obtain the following information. This information will be used to obtain MSDSs.

- Chemical name
- National Stock Number (NSN)
- Chemical manufacturer name
- Chemical manufacturer’s city, state, and phone numbers (if the chemical is not from the military supply system)

STEP 6: Obtain a MSDS for each HM stored in the cabinets.

- STEP 7: Manage shelf life IAW Chapter 7.
- STEP 8: Ensure all material in the cabinet is compatible IAW chapter 6.
- STEP 9: Organize cabinets with larger containers placed near the bottom of the storage cabinet. Ensure containers within the cabinet are closed.
- STEP 10: Store materials IAW TM 38-400.
- STEP 11: MSDSs shall be available readily available. Readily available means the MSDS is available 24/7 in less than 60 seconds to any employee.

2-3. Storage Buildings, Rooms, and Trailers

- a. CFMO will approve all buildings and rooms, for hazardous material storage.
- b. Keep buildings, rooms, and trailers clean and orderly. Conduct weekly inspections to ensure structural integrity including doors, hinges, and shelves. Do not remove doors, penetrate walls, modify ventilation, or otherwise modify the building or room. For POL trailers, use of the CMD insert is directed. Do not place CTA-50 items, generators or other equipment in the POL trailers.

NOTE: All 55 gallon drums must be stored off the floor and have spill containment under them. Totes or Intermediate Bulk Containers must have spill containment under them.

- c. To set up a storage building or room:

- STEP 1: Inspect the area to ensure that it meets all applicable rules and regulations.
- STEP 2: All CMD approved areas will provide for secondary containment equaling 100% of the largest container capacity plus 10%. Areas not pre-approved by CMD may not meet the requirement.
- STEP 3: Ensure appropriately rated fire extinguisher and spill response equipment is located nearby.
- STEP 4: Post any warning signs required by the SAFO. Do not place unauthorized signs, labels, stickers, or markings on the room or building.
- STEP 5: MSDSs shall be available readily available. Readily available means the MSDS is available 24/7 in less than 60 seconds to any employee.

- d. To set up a Trailer

- STEP 1: Readily identify the trailer with a sign on the rear door stating "POL Storage".
- STEP 2: Ensure CMD approved trailer inserts and all component pieces are installed and serviceable. All CMD approved inserts will provide adequate secondary containment. Trailers operating without inserts do not meet containment requirements.
- STEP 3: Establish AT and IDT Stockage levels equal to the amount the activities reasonably expect to consume during AT or within 2 IDT periods. There activities should manage

shelf life and rotation within the trailer IAW Chapter 9 instructions. Activities failing to follow this guidance are not in compliance with the HMMP storage and use. Excess material will be turned into the activity supporting OMS.

- STEP 4: Ensure appropriately rated fire extinguisher and spill response equipment is located nearby.
- STEP 5: Post any warning signs required by the SAFO. Do not place unauthorized signs, labels, stickers, or markings on the room or building.
- STEP 6: MSDSs shall be available readily available. Readily available means the MSDS is available 24/7 in less than 60 seconds to any employee.

2-4. Storage for Compressed Gases

NOTE: This section does not apply to fire extinguishers or spray cans. See Chapter 8 for specific guidance.

a. Compressed gases are under pressure, and should be handled with extreme care, particularly the flammable and explosive gases. If you are storing compressed gases, there are additional guidelines to follow.

CAUTION

- Do not use cylinders as rollers or supports, or for any other unintended purpose.
 - Do not accept, issue, or use a cylinder unless the contents are identified.
- b. Storage of compressed gases will follow Chapter 8 instructions.

Chapter 3

PROCUREMENT of HAZARDOUS MATERIALS

Hazardous Material (HM) can be found within all classes of supply. Product listed in the FEDLOG with a Hazardous Materials Indicator Code (HMIC) P or Y is considered HM under the Hazardous Material Management Plan (HMMP). This section outlines the procedures for ordering HM through the WAARNG automated supply system.

Under the distributed HMMP, participating activities are responsible for hazardous material management. Users rely on existing sources of supply and perform all aspects of hazardous material tracking including receipt, storage, issue, turn-in, disposal and reporting. The automated tracking system, HSMS, facilitates total visibility of HM for the purposes of environmental reporting, industrial health and safety, product substitution, and materials reuse.

3-1. Authorized Use List

a. All activities, in coordination with the P2 Manager, will develop a HM “Authorized Use List” (AUL) to meet their mission requirements. The AUL consists of a list of approved by the Activity supervisor/commander and the P2 Manager of NSNs that minimize HM concerns and meet the appropriate Lubrication Order. The AUL will contain the NSN, nomenclature, unit of issue, unit of measure, and quantity required on hand. The AUL will be updated and maintained by the activity and P2 manager. The AUL will be part of the HSMS database.

b. Hazardous Materials will be requisitioned through the existing automated supply system to the maximum extent possible. If materials must be procured via Local purchase, proper justification must be provided and forwarded to the P2 manager, approved and then forwarded to the supervisor/Approving Official (AO) who may then authorize the procurement. Local purchase of HM may be purchased on a bonafide emergency basis. Failing to manage HM inventories effectively does not constitute an emergency. For example, a pipe may rupture requiring an emergency repair, HM is needed and not available at the activity. This requirement may be purchased without adding it to the AUL if it is for one-time emergency use. However, the supervisor must file an emergency justification to the HM Program Manager within 24 hours of use. If the use of this material is expected to be recurring, it must go through the AUL approval process.

c. The AUL will denote products normally authorized for purchase by credit card.

d. Repeated use of the credit card for the same purchase may be indicative of abuse of the supply system and credit card.

(1) Products may be added to the AUL by submission of MIL FORM 510 (Authorized Use List Change Request) (Figure 3-1) to the P2 Manager for approval. The requested product(s) must have supporting justification documentation. This justification may include previous emergency purchases, change in mission, and/or equipment changes.

(2) Products can be removed from the AUL by submission of MIL FORM 510. Within 30 days, any on-hand HM removed from the activity’s AUL will be turned into the activity’s supporting FMS.

(3) Excess turned into the activity’s supporting FMS will be removed from the activities AUL.

e. The AUL, as an inspectable product, will be used to determine compliance with the HMMP. During inspections, products not authorized for use will be recovered for reuse or disposal. Material that

is on the AUL will have a Reorder Objective and Reorder Point set under the provisions of Chapter 9-4 WASH Pam 200-3. Material found to be excess per Chapter 9-4 of this regulation during inspections will be turned in and the activity cited for failure to follow established procedures. A monthly usage report will be generated and maintained at the activity to support the AUL. Activities will be required to submit a copy of the monthly usage roll up to the environmental office. The HSMS database and software will be made available at the user level to automate the tracking of, and use of HM.

f. **Restricted Products:** Some materials may be restricted or banned based upon chemical characteristics. Products on the Restricted Items List may pose a significant risk to human health and safety that may result in a usage restriction for that item. Prior to local purchase of HM, activities will refer to the Restricted Products List to ensure the product does not contain banned or restricted chemicals. If you have questions about a product, contact the P2 Manager. Chemicals that are banned or restricted will be published to the environmental web site, share point or directly available as Environmental Updates from the Environmental Office.

g. **Products Not Tracked by the HMMP:** Products which have been determined to have minimal risk to personnel and the environment, products that are returned to the supply system for repair, and products having special supply/funding channels are not monitored under the HMMP. These products are requested through normal supply channels and are funded by the requestor. For example:

h. Consumable products that present a minimal risk to personnel and the environment, e.g., office supplies, cleaning supplies, and toner cartridges purchased through GSA. These products are funded through the unit allotments from DCSLOG.

i. Products that are not consumed in use and are returned to the supply system for repair or disposition such as drive train components, brake shoes/pads, and repairable Class IX products, e.g., Line Replaceable Units (LRU) are returned to depot for repair and are funded through Class IX channels.

j. Products recycled on contract with a local vendor through an established exchange program such as compressed gas cylinders and lead-acid batteries that are recycled on a "one-for-one" exchange with local vendors.

k. Products having special supply/funding channels such as bulk fuel, ammunition, and most medical supplies are not tracked by the HMMP.

3-2. Procuring Hazardous Materials

a. This section serves as a guide to all units, all Field Maintenance Shops (FMS), Army Aviation Support Facilities (AASF), the Combined Support Maintenance Shop (CSMS), the Mobilization and Training Equipment Site (MATES), the Unit Training and Equipment Site (UTES) all maneuver area training sites, and all personnel who purchase products at the shop/unit level. The WAARNG will strive to substitute less hazardous or non-hazardous materials whenever practical in compliance with existing Technical Manuals.

b. Data from products ordered through the supply system will be extracted from SARSS and uploaded into the HSMS database by the Environmental Office. This will facilitate daily use reporting at activities throughout the state.

Follow the steps listed below to identify the applicable requisitioning procedure.

- STEP 1: Consult your activities AUL for the correct NSN and unit of issue based on the NSN. Further help and or guidance can be obtained from the Environmental Office.
- STEP 2: Consult the AAC code to determine if the product needs to be ordered through the GSA web site, local purchase, or through normal supply channels
- STEP 3: Products with an AAC of "L" are local purchase products and may be locally procured provided the product is on your activities AUL
- STEP 4: Input the request into one of the following systems: ULLS-S4, ULLS-G, SAMS, SARSS, PBUSE or other authorized requisitioning system.
- STEP 5: Assign the project code of "HZM". This is a locally assigned code used by USPFO to extract information on requests and to manage resources.
- STEP 6: Once the material has been ordered, it is the responsibility of the activity to initiate a follow up on the delivery status of the material. This is done in order to prevent multiple requests for the same product.

3-3. Local Purchase of HM:

The cardholder will complete the "Government VISA Request/Receipt Information" form and forward it thru the P2 manager env@wa.ngb.army.mil that will approve, substitute or disapprove the request and forward it to the Approving Official (AO). The AO will review the form and approve or disapprove the request (based on funding and criticality). An Approving Officer WILL NOT approve a request that has been DISAPPROVED by the P2 officer. This form will be used to track locally procured hazardous materials.

3-4. Mission Training Events:

Activities/units will submit a usage report to the Environmental Office for all training events.

3-5. Battery Requisition and Returns:

a. Objectives. To establish the procedures for the requisition and turn-in of CL IX batteries, to increase CL IX battery waste stream visibility/accountability, and to reduce the costs associated with CL IX batteries.

b. General: These procedures apply to all CL IX Alkaline and Carbon-Zinc, Lithium, Magnesium, Mercury, and Nickel-Cadmium batteries. Vehicle batteries are handled under local contract and not managed by the HMMP; this may also apply to aviation specific batteries. Prior to ordering new batteries, all used batteries will have been returned to the Hazardous Materials Office (HMO) Bldg. 27 Camp Murray using the turn-in procedures below:

c. Request Procedures

- STEP 1: Unit submits battery request memorandum to DCSLOG-M, Bldg. 18.
- STEP 2: DCSLOG-M approves request and forwards the request to the Environmental Office or to DCSLOG Stock Control SARSS-2 section.

- STEP 3: The USPFO warehouse and DCSLOG Stock Control will handle requests that are sent to DCSLOG.
- STEP 4: Requests that are forwarded to the Environmental Office will be handled accordingly for procurement.
- STEP 5: Activities will be notified when to pick up batteries requested that were handled by the Environmental Office.
- STEP 6: Units will sign for new batteries from the HMO, Bldg. 27, Camp Murray or the new batteries may be shipped to units via the supply truck from the USPFO warehouse

d. Turn-in Procedures

- STEP 1: Activities can turn-in batteries on Tuesdays, from 0700 – 1600 hours at the HMO, Bldg. 27, Camp Murray.
- STEP 2: Review the Waste Profile Sheet and ensure containers are correctly marked, packaged and labeled IAW the Waste Profile Sheet (see WAARNG Pam 200-1, Appendix B, Dangerous Waste Management Pam).
- STEP 3: Close and seal the waste containers. Use strapping or packing tape when sealing boxes. DO NOT use duct tape or masking tape. Activities turning in will be required to have batteries sorted according to type. Batteries in plastic trash bags will not be accepted unless they are sorted by type. For open-head drums, seal the drums with the ringbolts assembly pointing down so the containers may be double stacked later. Screw locking nuts into the middle section of the bolt on the open-head drum before turn-in.
- STEP 4: Complete a DA 3161 for the batteries to be turned-in.
- STEP 5: Transport the batteries to the HMO, Bldg. 27, Camp Murray, IAW the Transporting Requirements section of the WAARNG Pam 200-1, Dangerous Waste Management Pamphlet. Transporting dangerous wastes via public highway requires proper shipping documentation. DD Form 836 is the military's proper shipping paper per 49 CFR. Contact the HMO for instructions on filling out the DD Form 836.

NOTE: Units can transport UNIVERSAL Wastes without a hazardous waste manifest under the UNIVERSAL WASTE generator exclusion in WAC 173-303-070(b). However, units must still transport hazardous materials IAW DOT regulations.

3-6. Emergency Ordering Procedures

When products are needed in an emergency, the following procedures apply:

After Duty Hours and Weekends: Obtain approval from your AO and purchase supplies using government credit card. DCSLOG-S will assign a control number and return the form. The AO will coordinate with DCSLOG-S the first working day after the purchase. The cardholder will complete the "Government VISA Request/Receipt Information" form and forward it to the Approving Official (AO). The AO will review the form and forward the form via E-mail to the Environmental Office for review env@wa.ngb.army.mil . This form will be used to track locally procured hazardous materials.

NOTE: Always contact the P2 Manager before bringing a new product on to an installation. Always obtain an MSDS from contractors for all products that contain HM purchased with the government credit card.

Authorized Use List Change Request

This is a Request the following HM action:

_____ Continuous purchase approval and add to Authorized Use List.

_____ One-time purchase approval and add product HM database for storage purposes only.

_____ Deletion of product from Authorized Use List.

User & Material Information:

Command: _____ Work Center Supervisor: _____

Division/Shop: _____ User Telephone #: _____

Product Name: _____

NSN (If applicable): _____

Manufacturer (Name and Address): _____

How will product be used?: _____

Unit of issue (i.e. cn, ea, gl.): _____ Quantity requested: _____

Will waste be generated? Yes ___ No ___

Has substitution of less HM been considered? Yes ___ No ___

Copy of Material Safety Data Sheet (MSDS) is attached? Yes ___ No ___

Requester's Signature: _____ Date: _____

Environmental Approval Screening:

Request: ___ Approved ___ Disapproved

Reason for disapproval: _____

Signature: _____

MIL FORM 510 18Feb05
(WAARNG Pam 200-3)

Figure 3-1. Authorized Use List Change Request (MIL FORM 510)

Chapter 4 Usage and Inventory

4-1. Daily Usage

a. Activities will track daily usage and fill out a daily usage log to enable computation of stock levels at the respective activity. The Hazardous Substance Management System (HSMS) database will be available to facilitate usage tracking and inventory control. This will provide data for the Reorder Objective and Reorder Point computation needed to adjust the AUL if required.

b. Activities will be required to keep and file a copy of the daily usage log. This daily usage log will be an Excel spreadsheet provided by the P2 Manager and will be used to produce the monthly usage roll up report for the month. Activities will be required to submit an electronic copy of the monthly usage roll up to the P2 Manager at env@wa.ngb.army.mil. This report will be due NLT the 10th of the following month. Activities failing to report will be reported to the AAG/A.

c. When a product's ROP is reached on the daily usage log, that product should be reordered as soon as possible to avoid critical shortages at the end user level. This method will ensure a constant flow of product in the supply system to replenish what is being used.

d. Data from this monthly usage report will also be used for SPCC reporting requirements.

4-2. Monthly Test Date Survey

Activities will be required to verify that the test date expiration for an item has not been exceeded. The activity will conduct a monthly test date survey on a monthly basis. The purpose of this inspection is to prevent the loss of material through test date expiration. Products that will not be used by the activity prior to test date expiration must be turned in for reuse/redistribution or disposal to the HMO Bldg. 27, Camp Murray BEFORE the expiration occurs. Systematic abuses with test date expiration will be documented and reported up the chain of command. Appointments and instructions for turn-in can be arranged by contacting the P2 Manager telephone at 253-512-8883 or email at env@wa.ngb.army.mil.

Test date survey procedures

STEP 1: Check products in the location to ascertain the test dates.

STEP 2: Move the products with the oldest test date to the front of the location and place the products with the newest test date to the rear of the location.

STEP 3: Every effort will be made to use the product within 30 days of the test date expiration or turned in to the HMO Bldg. 27, Camp Murray.

Chapter 5

Material Safety Data Sheets

5-1. Material Safety Data Sheets

a. Before using HM, you must become familiar with associated hazards, specific handling procedures, and spill response measures. The product Material Safety Data Sheet (MSDS) provides this handling information; there must be an MSDS for every HM on hand.

b. Steps for managing MSDS sheets in your activity:

STEP 1: Activities using HM must have a MSDS on-hand prior to use. If one is not on-hand, obtain one from the manufacturer, Hazardous Materials Information System (HMIS), Siri.org, or by contacting the P2 Manager. The MSDS must be specific to the product's National Stock Number (NSN) and CAGE number (manufacturer's code). These numbers are printed on the MSDS and on the HM container.

STEP 2: Create and maintain a facility MSDS binder; ensure that the binder is readily accessible and visible to all employees. This binder must reflect the current inventory of the activity.
Archive non-current MSDS IAW current army publication archive standards.

STEP 3: Organize the MSDS binder in a manner that will facilitate retrieval of a specific MSDS.

STEP 4: Create an index of the MSDSs and place it in the front of the binder.

STEP 5: Every activity must maintain a master MSDS binder or catalog. The activity does not need to maintain MSDS at each workstation; however the MSDS must be readily accessible when needed. There should be a HM MSDS available in each area where that material is used and stored.

Chapter 6 Compatibility

6-1. Determining Hazardous Material Compatibility

To help activities determine what HM can be stored together and what cannot be stored together, the DOD created the Hazardous Chemical Compatibility System. This chapter describes the basics of this sorting system. For more information, see TM 38-410, Storage and Handling of Hazardous Materials. The Hazardous Chemical Compatibility System is designed to work with MSDSs generated from the HMIS; however, it will also work for most non-HMIS generated MSDSs. If the MSDS is not available through the HMIS, you may obtain a copy from the P2 Manager, HMIS, Siri.org, or the manufacturer.

6-2. Determining the HCC

- STEP 1: Locate the proper MSDS for the material at hand
- STEP 2: Look in the section titled PHYSICAL/CHEMICAL PROPERTIES
- STEP 3: Look for HCC: XX where XX is the 2 digit code of the HCC. Assume the code is F5.
- STEP 4: Look on the Plano graph Figure 6-1, locate the Flammable Material section located on the far right.
- STEP 5: Note that materials coded F5, F6, F7, F8 are stored separately in different cabinets. Material coded V2, and V3 are compatible and can be stored together with each other but separate from all others. Material F1, F2, F3, F4, and V4 are compatible and can be stored together with each other but separate from all others.
- STEP 6: Refer to the chart in Fig 6-2 for further guidance for segregation concerning horizontal spacing.

HCC	HAZARD CHARACTERISTICS GROUP	A	C	D	E	F	G	L	P	R	T	SECONDARY SEGERATION
A1	Radioactive, Licensed	*										Note A
A2	Radioactive, License Exempt	*										Note A
A3	Radioactive, License Exempt, Authorized	*										Note A
B1	Alkali, Corrosive Inorganic		*									Note B
B2	Alkali, Corrosive Organic		*									Note C
B3	Alkali, Low Risk							*				Note F
C1	Acid, Corrosive Inorganic		*									Note D
C2	Acid, Corrosive Organic		*									Note E
C3	Acid, Low Risk							*				Note F
C4	Acid, Corrosive and Oxidizer, Inorganic		*									Note D
C5	Acid, Corrosive and Oxidizer, Organic		*									Note E
D1	Oxidizer			*								None
D2	Oxidizer and Poison			*								Note G
D3	Oxidizer and Corrosive Acidic			*								Note G
D4	Oxidizer and Corrosive Alkali			*								Note G
E1	Explosive, Military				*							Note H
E2	Explosive, Low Risk							*				Note A
F1	Flammable Liquid DOT PG I, OSHA IA					*						Note J
F2	Flammable Liquid DOT PG II, OSHA IB					*						Note J
F3	Flammable Liquid DOT PG III, OSHA IC					*						Note J
F4	Flammable Liquid DOT PG III, OSHA II					*						Note J
F5	Flammable Liquid and Poison					*						Note L
F6	Flammable Liquid & Corrosive, Acidic					*						Note L
F7	Flammable Liquid & Corrosive, Alkali					*						Note L
F8	Flammable Solid					*						Note K
G1	Gas, Poison (Nonflammable)						*					Note M
G2	Gas, Flammable						*					Note N
G3	Gas, Nonflammable						*					Note P
G4	Gas, Nonflammable, Oxidizer						*					Note R
G5	Gas, Nonflammable, Corrosive						*					Note S
G6	Gas, Poison, Corrosive(Nonflammable)						*					Note T
G7	Gas, poison, Oxidizer(Nonflammable)						*					Note U
G8	Gas, Poison, Flammable						*					Note V
G9	Gas, poison, Corrosive, Oxidizer(Nonflammable)						*					Note W
K1	Infectious Substance										*	Note X
K2	Cytotoxic Drugs										*	Note Y
M1	Magnetized Material							*				None
N1	Not Regulated as Hazardous							*				None
P1	Peroxide, Organic, DOT Regulated								*			None
P2	Peroxide, Organic(Low Risk)								*			None
R1	Reactive Chemical, Flammable									*		Note Z
R2	Water Reactive Chemical									*		Note AA
T1	DOT Poison - Inhalation Hazard										*	None
T2	UN Poison, Packing Group I										*	None

Figure 6-2. Compatibility Chart.

T3	UN Poison, Packing Group II									*	None
T4	UN Poison, Packing Group III								*		Note BB
T5	Pesticide, Low Risk								*		None
T6	Health Hazard					*	*	*	*	*	None
T7	Carcinogen (OSHA, NTP, IARC)									*	Note CC
V1	Miscellaneous Hazardous Materials Class 9								*		None
V2	Aerosol, Nonflammable				*						Note EE
V3	Aerosol, Flammable				*						Note EE
V4	DOT Combustible Liquid, OSHA IIIA				*						None
V5	Hi-Flash Point Liquids, OSHA IIIB							*			None
V6	Petroleum Products							*			None
V7	Environmental Hazard							*			None
Z1	Article Containing Asbestos							*			None
Z2	Article Containing Mercury							*			None
Z3	Article Containing Polychlorinated Biphenyl (PCB)							*			None
Z4	Article, Battery, Lead Acid, Non-spill able							*			None
Z5	Article, Battery, Nickel Cadmium, Non-spill able							*			None
Z6	Article, Battery, Lithium								*		Note DD
Z7	Article, Battery, Dry Cell							*			None

Figure 6-2. Compatibility Chart (cont)

DEFINITION OF NOTES

NOTE A - Security Storage - must be well ventilated with limited access.

NOTE B - Inorganic Alkali Storage - store away from acids by at least one 4 ft aisle width and away from organic alkalis by at least one 4 ft aisle width.

NOTE C - Organic Alkali Storage - store away from acids by at least one 4 ft aisle width and away from inorganic alkalis by at least one 4 ft aisle width.

NOTE D - Inorganic Acid Storage - store away from alkalis (caustics) by at least one 4 ft aisle width and away from organic acids by at least one 4 ft aisle width. Separate from other acids with subsidiary risk labels by at least one 4 ft aisle width.

NOTE E - Organic Acid Storage - store away from alkalis (caustics) by at least one 4 ft aisle width and away from inorganic acids by at least one 4 ft aisle width. Separate from other acids with subsidiary risk labels by at least one 4 ft aisle width.

NOTE F - Further separate into Acid and Alkali Storage within the low hazard storage area to keep potentially incompatible products from mixing.

NOTE G - Separate from other oxidizers and oxidizers with secondary hazards by at least one 4 ft aisle width.

NOTE H - Magazine Storage.

NOTE J - Segregate into flammable liquid storage separate from flammable solids by at least one 4 ft aisle width.

NOTE K - Segregate into flammable solid storage separate from flammable liquids by at least one 4 ft aisle width.

NOTE L - Separate from other flammables and flammables with secondary hazards by at least one 4 ft aisle width.

NOTE M - Further segregate into Poison Gas storage within compressed gas area.

NOTE N - Further segregate into Flammable Gas storage within compressed gas area.

NOTE P - Further segregate into Nonflammable Gas storage within compressed gas area.

NOTE R - Further segregate into Oxidizer Gas within the Nonflammable Gas storage that is within the compressed gas area.

NOTE S - Further segregate into Corrosive Gas within the Nonflammable Gas storage that is within the compressed gas area.

NOTE T - Further segregate into Corrosive Gas within the Poison Gas storage that is within the compressed gas area.

NOTE U - Further segregate into Oxidizer Gas within the Poison Gas storage that is within the compressed gas area.

NOTE V - Further segregate into Flammable Gas within the Poison Gas storage that is within the compressed gas area.

NOTE W - Further segregate into Corrosive and Oxidizer Gas within the Poison Gas storage that is within the compressed gas area.

NOTE X - Further segregate into biomedical storage within the Poison Storage area.

NOTE Y - Further segregate into Medical Security storage within the Poison Storage area.

NOTE Z - Further segregate into a Spontaneously Combustible storage within the Reactive Storage area.

NOTE AA - Should not store in areas protected with water sprinkler system. Fire protection should be non-water based.

NOTE BB - Store away from food.

NOTE CC - Further segregation within Poison Storage area may be necessary if secondary hazards exist (i.e. flammable, corrosive, etc.)

NOTE DD - Separate from other products within the Reactive Storage area.

NOTE EE - Store aerosols from flammables by placing in separate room or barrier such as floor to ceiling wire mesh, chain link fence, etc. to protect personnel from aerosols that can become self-propelled projectiles.

Chapter 7 Shelf-Life

7-1. Shelf-Life Management

a. The goal of proper shelf-life management is to avoid having to extend shelf-life of material by performing a monthly shelf-life survey, turn-in of excess stocks, and ordering the minimum needed to sustain the activity.

b. The primary steps in stocking HM are listed below:

STEP 1: Obtain all MSDSs and ensure that every container on-hand at your activity is properly labeled with the:

Product name

Any warnings of physical or health hazards listed on the MSDS

Label any HM that does not have a readable label. It is preferred that you maintain the original manufacturer's label by proper storage techniques. However, if the original label is missing or damaged, use the type of label shown below:

NSN: 6950-00-224-6656 Chemical Name: Cleaning Compound Rifle Bore Manufacturer Name: American Writing Ink Co DATE MFR: 10-2003 INSP: 10-2005
--

NOTE: If the material is transferred to a different container, label the new container with the NSN, Chemical Name, Manufacturer Name, and any appropriate hazard warnings prior to storing the new container.

STEP 2: IAW TM 38-410, Storage and Handling of Hazardous Materials, segregate material by compatibility of storage requirements in Chapter 6.

STEP 3: Store HM in an appropriate location and manner.

STEP 4: Place HM on shelves or racks following the guidance of the newest stock in the back of the shelf and oldest in the front based on the date of manufacture.

7-2. Shelf-Life and Tracking Survey

a. This section covers the WAARNG shelf-life program and how it works within the DOD shelf-life program. An understanding of the DOD shelf-life program is necessary in order to conduct a shelf-life survey.

Most HM purchased through the military supply system has an expiration date (test date or inspection date) printed on the container label. These dates are key to the shelf-life program.

NOTE: HM purchased locally usually does not have a published expiration date. Call the P2 Manager for guidance to establish a shelf-life for these products.

c. Using the DOD Shelf-Life Program

(1) Shelf-life is the total periods of time, beginning with the date of manufacture, cure, assemble, pack, or inspect/test/restorative action, that a product may remain in the storage system and still remain suitable for the products intended use.

(2) Products commercially purchased that are similar to military products can be assumed to have a shelf-life (e.g. paint from NAPA can be assumed to have a shelf-life similar to paint ordered through the military system, which has a shelf-life of 24 months).

NOTE: Products procured locally can be assumed to have lost 1/3 of the products shelf-life by the time it reaches the end user.

d. Shelf-life or Non-shelf-life

(1) To determine if product has shelf-life expiration, access the FEDLOG Army Master Data File.

STEP 1: Enter the NSN.

STEP 2: High light the information in the SLC column and click the right mouse button.

Note: The FEDLOG provides the shelf-life period. If the FEDLOG is unavailable contact the P2 Manager.

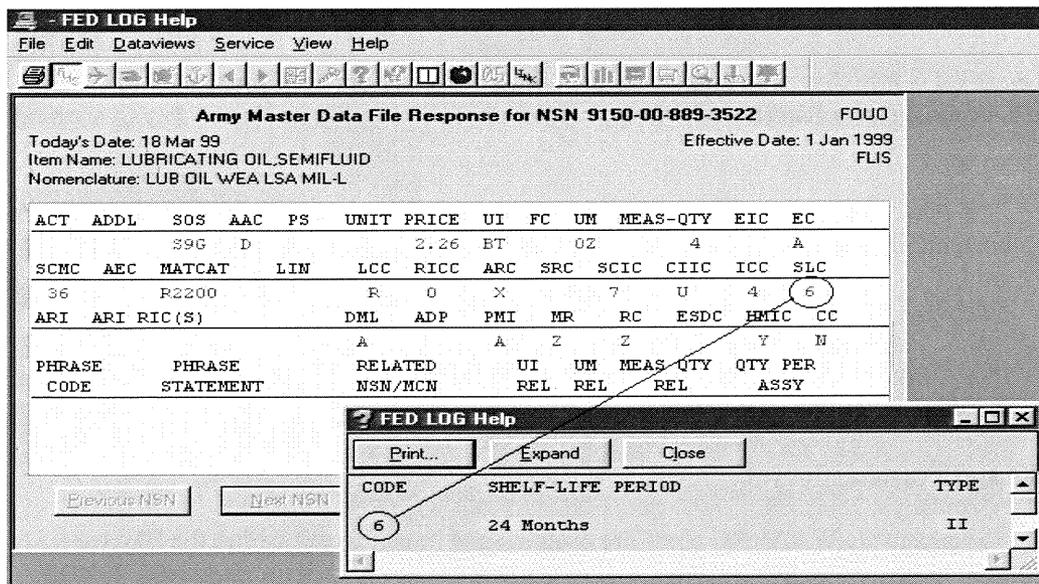


Figure 7-1. FEDLOG Extract

(3) If the product has a shelf-life expiration, properly manage it as a Type I or Type II Material, as explained in the following sections.

e. Type I Materials

Type I materials have an alphabetical shelf-life code and an expiration date. These materials are not extendible.

NOTE: DOD policy requires that Type I HM be used or turned-in of within 30 days of the expiration date.

f. Type II Materials

Type II materials have a numeric shelf-life code and either a test date or an inspection date. These materials may be extended through visual inspection or laboratory testing:

To extend by: Consult the:

Visual Inspection Material Quality Control Storage Standard (MQCSS) at www.shelflife.hq.dla.mil. The MQCSS provides information from NSN on how to visually inspect a product.

Laboratory Testing Quality Status Listing (QSL) at www.shelflife.hq.dla.mil. The QSL provides laboratory-testing data for HM.

NOTE: You must use, extend, or turn-in of Type II product prior to their expiration date.

g. Extending the Shelf-Life of Type II material

STEP 1: Prior to the shelf-life expiration, determine if the shelf-life can be extended by test or inspection.

STEP 2: If the product can be extended, see the Extending by Inspection section for specific information on using the QSL, visual inspection, or call the P2 Manager to extend the product.

STEP 3: If the product is not listed on the QSL call the P2 Manager for guidance.

STEP 4: If the P2 Manager determines that the shelf-life cannot be extended turn-in IAW the DWMP.

For more information, consult the Shelf-Life Item Management Manual (DOD 4140.27-M). This manual prescribes codes for HM that meets shelf-life criteria. The codes show the HM's shelf-life and how long it may be extended.

h. Extend the product based on the QSL.

STEP 1: Access the QSL on-line to see if the material has a test date. (Figure 7-2)

QUALITY STATUS LIST

Download Query Results NOTE: Do NOT attempt to download from this screen if you are using Internet Explorer 3.0. Doing so will cause problems with the download. Netscape 4.0 and IE 4.0 users should not experience any problems.

NSN	CONTRACT NUMBER	LOT/BATCH	NOUN	SPECIFICATION	LAST TEST	TEST DUE	CONDITION CODE	ISSUE TO
9150008893522	DLA40091C5228	SC03		MIL-L-46000	091997	091999	A	ALL
9150008893522	DLA45193M3211	745		MIL-L-46000	121997	121999	A	ALL
9150008893522	SP045094C0871	V101		MIL-L-46000	081998	082000	A	ALL
9150008893522	SP045194C0871	V101		MIL-L-46000	111997	111999	A	ALL

Figure 7-2. QSL Extract

STEP 2: If new test date is available, mark each container with the following information:

- The new test date.
- Initials of person who inspected and extended product.

Chapter 8 Compressed Gas Cylinder

8-1. Purpose

a. The purpose of this chapter is to provide guidance concerning the safe handling and use of compressed gas cylinders; this section is not all inclusive of federal and state regulations. Compressed gases are unique in that they represent both a physical and potential chemical hazard (depending on the particular gas). The gases contained in these cylinders vary in chemical properties, ranging from inert and harmless to toxic and explosive. The high pressures of the gases constitute a serious hazard in the event that the cylinders sustain physical damage and/or are exposed to high temperatures.

b. Personnel having the responsibility of storing, handling, and/or using compressed gases and gas cylinders must have a working knowledge of the characteristics and hazards associated with each individual gas. Specific and detailed information on the properties and/or hazards of any gas is best obtained from the manufacturer or supplier of the product through Material Safety Data Sheets (MSDS) or brochures. Additional information to that provided in this document is available in other reference material from commercial sources.

8-2. Responsibility

a. Compressed gas cylinders should be handled only by experienced and properly instructed personnel.

b. The user responsible for the cylinder and for its installation should check the identity of the gas before use. If the cylinder content is not identified, if hydrostatic test date is past due, or if the cylinder is in any way damaged, the cylinder should be returned to the supplier.

8-3. Information and Storage

Further information may be obtained from the SAFO or contact the Environmental Office for a copy of AR 700-68

a. All compressed gas cylinders in storage waiting use or shipment shall be secured by either palletizing them or storing them standing in a valve end upright position, nested tightly together, in an approved storage area where they are unlikely to be knocked over.

(1) Cylinders that cannot otherwise be secured shall be bound together in groups of three or more to reduce their capability of being knocked over.

(2) Individual cylinders will be secured by chain to a non moveable object that prevents the cylinder from falling over.

b. Cylinders that are inherently unstable in the vertical position, must be palletized, boxed, crated, or secured to a fixed stanchion or fixture. Cylinders located in an authorized storage area that permits pedestrian or vehicular traffic, must be palletized, boxed, crated, or secured to a fixed stanchion or fixture.

c. All storage facilities for compressed gases should be separated from other buildings by at least 50 feet.

d. Compressed gases should be stored in roofed, open-sided sheds on an above-grade concrete slab if climatic conditions are favorable and security precautions are adequate. Sheds should be constructed of light, noncombustible materials.

e. Cylinders of flammable gases and gases that support combustion must be stored in separate sheds with a distance of at least 50 feet between sheds or by an approved firewall or fire barrier. The storage arrangement should protect the cylinders from direct exposure to sunlight.

f. To assure complete identification, compressed gas cylinders should be tagged/labeled with the stock number for the full cylinder and the stock number for the empty cylinder.

g. Cylinder caps must be in place when cylinders are not in use or when stored.

Chapter 9

Excess and Stockage Levels

9-1. General

- a. The definition of excess Hazardous Material is any material that will not be used for its intended purpose within six months from date of receipt of the material.
- b. Excess material can be turned in to building 27 on Camp Murray by filling out a DA Form 3161 request for issue/turn-in. Coordinate the paperwork with the HMO prior to transport of the material.
- c. Material cannot remain on site past sixty calendar days once coordination has been made.

9-2. Turn-In Procedures for Excess

- STEP 1: Fill out the DA Form 3161
- STEP 2: Obtain an MSDS for each product being turned in. If you do not have an MSDS contact the P2Manager at 253-512-8883.
- STEP 3: Call the HMO at (253) 512-8883/8119 DSN 323-8883/8119 to make an appointment to turn in the material. Do not bring the material to the HMO Bldg. 27 Camp Murray until instructed to.
- STEP 4: E-mail or fax the completed DA Form 3161 to the Hazardous Materials Office (HMO).
env@wa.ngb.army.mil
Fax number is 253-512-8904.
- STEP 5: Transport the material to the HMO or place material on the DCSLOG-W supply truck when instructed to by the HMO. When material is shipped via the DCSLOG-W supply truck instruct the driver to notify HMO when the truck arrives at DCSLOG-W.

9-3. Turn-In Procedures for Expired Shelf Life

- STEP 1: Fill out the DA Form 3161. Annotate in the CODE * column CC = J (condition code J suspended-in stock).
- STEP 2: Obtain an MSDS for each product being turned in. If you do not have an MSDS contact the P2 Manager at 253-512-8883.
- STEP 3: Call the Hazmat Office at (253) 512-8883 DSN 323-8883 to make an appointment to turn in the material. Do not bring the material to the HMO Bldg. 27 Camp Murray until instructed to.
- STEP 4: E-mail or fax the completed DA Form 3161 to the HMO
env@wa.ngb.army.mil
Fax number is 253-512-8904.
- STEP 5: Transport the material to the Hazmat Office or place material on the DCSLOG-W supply truck when instructed to by the HMO. When material is shipped via the DCSLOG-W supply truck instruct the driver to notify HMO when the truck arrives at DCSLOG-W.

9-4. Stockage Levels

Activities/Units will be on a 30/60-day supply cycle to preclude excess material from being generated. The charts below will provide guidance on setting stockage levels. RO (reorder objective) is the maximum amount of material that you want to stock on your shelf based on usage. ROP (reorder point) is the point at which you reorder the material that you use up.

30 day

MATES, UTES, CSMS, AASF-1, FMS (all), AASF-2

60 day

All Units

If an entity is on a 30-day cycle and uses 17 units of a product then the 30-day chart tells you that your objective for stockage is 20 and the point at which you would reorder is 12 units. Simple formula to remember is On Hand + On Order = RO

Table 9-1. Stockage Levels

30 DAY

# used	RO	ROP
1 - 5	5	3
6 - 10	10	6
11 - 15	15	9
16 - 20	20	12
21 - 25	25	15
26 - 30	30	18

60 DAY

# used	RO	ROP
1 - 5	5	3
6 - 10	10	6
11 - 15	15	9
16 - 20	20	12
21 - 25	25	15
26 - 30	30	18

Chapter 10

POL Trailers

POL trailers pose a unique management issue. Product stored inside the trailers is exposed more to the elements than product stored elsewhere and tends to be out of sight out of mind. This creates a loss of product more to mismanagement than other storage areas.

10-1. Best Management Practice

- a. The preferred procedure for POL Trailers is to not store product in the trailers, but to download the product after each training event.
- b. Where the procedure in 10-1a is not feasible follow the guidance in 10-2 and 10-3.
- c. Trailers containing product will be placarded with a DANGEROUS placard.
- d. Trailers that are EMPTY will not be placarded.

10-2. Inspection

- a. Trailers will be inspected on a weekly basis, with particular attention to the overall condition of the trailer.
 - Inside inspection for water leaks
 - Condition of covering on trailer
 - Condition of the storage racks
 - Standing water in the bottom of the trailer
- b. Product inspection will be performed on a weekly basis with special attention paid to the condition of the product containers.
 - Metal product containers will be inspected for rust
 - Leaking containers
 - Damaged labeling
 - Damaged container for grease tubes

10-3. Product Test Dates, Product Rotation.

Management issues for POL trailers require a weekly survey of the test dates on the product stored within be performed on a weekly basis.

- Product is rotated such that no product is allowed to reach test date expiration
- Product with container degradation is rotated and used to the greatest extent
- New product that is ordered is placed in storage and old is rotated out for use by sending to another activity.

Appendix A References

Section I
Required Publications

Section II
Related Publications

AR 200-1
Environmental Protection and Enhancement

AR 200-2
Environmental Effects of Army Actions

AR 27-40
Litigation

AR 700-68
Storage and Handling of Compressed Gases and Liquids in Cylinders, and of Cylinders

NGR 750-51
Command Maintenance Evaluation Team

WAARNG Pam 200-1
Dangerous Waste Management Pamphlet

TM 38-400
Joint Services Manual (JSM) for Storage and Material Handling

TM 38-410
Storage and Handling of Hazardous Materials

HMIS
Hazardous Material Information System

Glossary

The following definitions are specific to this Pamphlet. In some cases, these definitions may vary from those found in the regulations, as they are summarized or are a composite of definitions from different regulations.

Section I Abbreviations

AASF

Army Aviation Support Facility

AcoS AVN/SFTY

Assistant Chief of Staff, Aviation/Safety

AcoS LOG

Assistant Chief of Staff, Logistics

AR

Army Regulation

AUL

Authorized Use List

CoS-AS

Chief of Staff-Army Staff

CoS-JS

Chief of Staff-Joint Staff

CSMS

Combined Support Maintenance Shop

DA

Department of the Army

DAG

The Deputy Adjutant General

DOD

Department of Defense

DOT

Department of Transportation

DRMO

Department of Reutilization and Marketing Office

EA

Environmental Assessment

ECO
Environmental Compliance Officer

EIS
Environmental Impact Statements

EMS
Environmental Management System

EPA
Environmental Protection Agency

EPR
Environmental Program Requirements

EPS
Environmental Protection Specialist

EQCC
Environmental Quality Control Committee

EQR
Environmental Quality Report

FEC
Facility Environmental Coordinator

FEDLOG
Federal Logistical Data System

FFCAct
Federal Facilities Compliance Act

FMO-EV
Facility Management Office -Environmental Branch

FMS
Field Maintenance Shop

GSA
General Services Administration

HAZCOM
Hazard Communication

HCC
Hazardous Characteristic Code

HCP
Hazard Communication Plan

HMCG
Hazardous Material Control Group

HMIS
Hazardous Material Information System

HSAC
Hazardous Storage Area Code

IAW
In accordance with

IPMP
Integrated Pesticide Management Plan

ISCP
Installation Spill Contingency Plan

JSM
Joint Service Manual

MATES
Mobilization and Training Equipment Site

MQCSS
Material Quality Control Storage Standard

MSDS
Material Safety Data Sheet

NGB
National Guard Bureau

NFPA
National Fire Protection Association

NSN
National Stock Number

OSHA
Occupational Safety and Health Administration

P2
Pollution Prevention

POL
Petroleum Oil Lubricant

QSL
Quality Status Listing

SMO
Surface Maintenance Officer

SOP
Standard Operating Procedure

SPCCP
Spill Prevention Control and Countermeasures Plan

SSO
State Safety Officer

TAG
The Adjutant General

TM
Technical Manual

UECO
Unit Environmental Compliance Officer

USPFO
United States Property and Fiscal Office

WAARNG
Washington Army National Guard

WAC
Washington Administrative Code

WDOE
Washington Department of Ecology

Section II

Terms

Hazardous Material (HM)

Defined by the U.S. Department of Transportation (DOT) as anything that, due to its chemical, physical, or biological nature, causes safety, public health, or environmental concerns. HAZMAT includes HW and materials exhibiting explosive, flammable, corrosive, or oxidizing properties.

Material Safety Data Sheet (MSDS)

A collection of information required by the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard. An MSDS includes the identity of hazardous chemicals, health and physical hazards, exposure limits, and safety precautions.

Activity

Unit, organization, installation that performs a function or mission; or, a group on an installation or facility that is assigned space for a common use or function and is held operationally accountable by an authority other than the installation commander (e.g. airfields, hospitals, arsenals, commissaries)